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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION

This document relates to:

ALL ACTIONS

MDL No. 2843  
Case No. 18-md-02843-VC

**STIPULATION AND [PROPOSED]  
ORDER SEEKING TO TAKE THREE  
DEPOSITIONS BEYOND COURT  
IMPOSED DEADLINES**

Judge: Hon. Vince Chhabria  
Courtroom: VIA VIDEOCONFERENCE

**THE PARTIES STIPULATE AND AGREE AS FOLLOWS:**

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs and Facebook, Inc. (collectively, the "Parties") submit this joint stipulation requesting a short extension of the July 22, 2022 deadline set by the Court to complete Rule 30(b)(6) depositions.

WHEREAS, on April 6, 2022, the Court entered an order modifying the case schedule under which the close of fact discovery is set for September 16, 2022 (Dkt. No. 908);

WHEREAS, on June 10, 2022, the Court set a deadline of June 30, 2022 to complete Rule 30(b)(6) depositions, except for certain topics for which the Court set a separate deadline of July 22, 2022, subject to the time it would take to resolve any issues going to the scope of these depositions before the Special Master and then to schedule (or reschedule) them (Dkt. No. 941);

WHEREAS, following resolution of certain issues before the Special Master or agreement by the parties on scope issues relating to Rule 30(b)(6) depositions and/or due to scheduling issues, the Parties have agreed to the following deadlines for all remaining Rule 30(b)(6) and fact depositions (with the proviso that additional testimony may be taken after these dates if good cause is shown or if the deposition is rescheduled by agreement of the parties, but in no case later than September 16, 2022 (with the exception of Ms. Sandberg's deposition)):

- August 5, 2022. Deadline for further Rule 30(b)(6) deposition on portions of certain topics as they relate to targeted advertising;
- August 16, 2022. Deadline for Rule 30(b)(6) deposition on Topic 5;
- August 18, 2022. Deadline for further Rule 30(b)(6) deposition on Topic 10;
- September 1, 2022. Deadline for further Rule 30(b)(6) deposition on Topics 2/3 as they relate to ADI;
- September 20, 2022. Deadline for deposition of Sheryl Sandberg.

NOW THEREFORE, the Parties hereby stipulate, subject to Court approval, to the following exemptions from the existing case schedule and Court-ordered deadlines (with the proviso that additional testimony may be taken after these dates if good cause is shown or if the deposition is rescheduled by agreement of the parties, but in no case later than September 16, 2022 (with the exception of Ms. Sandberg's deposition)):

- August 5, 2022. Deadline for further Rule 30(b)(6) deposition on portions of certain topics as they relate to targeted advertising;
- August 16, 2022. Deadline for Rule 30(b)(6) deposition on Topic 5;

- August 18, 2022. Deadline for further Rule 30(b)(6) deposition on Topic 10;
- September 1, 2022. Deadline for further Rule 30(b)(6) deposition on Topics 2/3 as they relate to ADI;
- September 20, 2022. Deadline for deposition of Sheryl Sandberg.

Dated: August 4, 2022

Respectfully submitted,

KELLER ROHRBACK L.L.P.

By: /s/ Derek W. Loeser  
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**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, Derek W. Loeser, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 4th day of August, 2022, at Seattle, Washington.

/s/ Derek W. Loeser

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Derek W. Loeser

**[PROPOSED] ORDER**

Pursuant to the stipulation of the Parties, the Court modifies the case schedule as follows:

- August 5, 2022. Deadline for further Rule 30(b)(6) deposition on portions of certain topics as they relate to targeted advertising;
- August 19, 2022. Deadline for further Rule 30(b)(6) deposition on Topic 10;
- August 26, 2022. Deadline for Rule 30(b)(6) deposition on Topic 5;
- September 1, 2022. Deadline for further Rule 30(b)(6) deposition on Topics 2/3 as they relate to ADI;
- September 20, 2022. Deadline for deposition of Sheryl Sandberg.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Date: August 8, 2022.

